

EXHIBIT A



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BY UPS OVERNIGHT

Hon. Leonie M. Brinkema
UNITED STATES DISTRICT JUDGE
ALBERT V. BRYAN U.S. COURTHOUSE
401 Courthouse Square
Alexandria, VA 22314

**Re: Christian Alberto Santos Garcia, et al. v. Chad F. Wolf, et al.
Case No. 1:20-cv-00821**

Dear Judge Brinkema:

Enclosed, in connection with the above-referenced matter, as required by the Order entered August 11, 2020 (ECF No. 44), please find a sealed envelope containing the following materials:

- Representative photographs of ICA Farmville Dorm 2 (46 capacity) including:
 - Two photographs of the bunk area
 - A photograph showing two (2) handicapped accessible sinks
 - A photograph showing three (3) showers
 - A photograph showing three (3) toilets with sinks built into the top of the tank
- Representative photographs of ICA Farmville Dorm 4 (98 capacity) including:
 - A photograph of the rear to front view of Dorm 4
 - A photograph of the front to rear view of Dorm 4
 - A closer photograph of the bunk area in Dorm 4
 - A photograph showing six (6) toilets with sinks built into the top of the tank of certain toilets
 - A photograph showing six (6) showers
 - A photograph showing an overview of the Dorm 4 restrooms including two (2) handicap accessible sinks
- An Overall Floor Plan of ICA Farmville

These photographs were taken during the last few days and are representative of the facility during the current pandemic. The photographs previously submitted by Plaintiffs (ECF No. 45-1) depict the facility in or around 2010.

Please note with respect to the bunk areas that all beds are bolted down for safety and security reasons as required by ICE's Field Office Director seven years ago, and this is how the beds normally are arranged. However, because the facility is currently at 39% capacity, bunk

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assignments have been adjusted to arrange sleeping locations to permit social distancing to the maximum extent possible.

Also please note with respect to the bathroom areas that all showers have curtain rods and curtains which have been temporarily removed to provide photographic clarity. Also, most toilets have a sink on top of them, which is standard for such a facility. However, additional handicapped accessible sinks are installed in handicapped accessible dorms as shown in the photographs.

Dorm 4 (capacity 98) is representative of Dorms 1, 5, 6, 7, 8, and 9, though Dorms 6 through 9 have slightly less capacity at 84 detainees each, Dorm 1 has slightly larger capacity at 100, and Dorm 5 has slightly more capacity at 102. The square footage changes in each dormitory to accommodate the increase or decrease in capacity, but the average square footage per detainee in each housing unit is approximately the same. Dorm 2, which has a capacity of 46 detainees, is representative of Dorm 3, which has a capacity of 42 detainees.

To see additional information about the facility, we also reference a YouTube video that is publicly accessible at the following web address:

https://www.youtube.com/watch?v=omwv1flk_ds.

Although this video does not depict the facility during the pandemic, this video is helpful in understanding the overall physical layout of ICA Farmville.

We greatly appreciate your attention to this matter. Please let me know if you require any further information.

Respectfully,

A handwritten signature in blue ink, appearing to read "John M. Erbach", is written over a horizontal line.

John M. Erbach

JME/bay

Enclosures

cc: Katie King, Esq (by UPS Overnight; w/ encl.)
All Counsel of Record (by Email; w/o encl.)